

# EXHIBIT A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KELLY PRICE,

Plaintiffs,

-against-

THE CITY OF NEW YORK, et al.,

Defendants,

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DECLARATION OF  
ASSISTANT DISTRICT  
ATTORNEY CHRISTOPHER  
RYAN

11 CIV. 2141 (JGK)

CHRISTOPHER RYAN, declares pursuant to 28 U.S.C. §1746, under penalty of perjury, that the following is true and correct:

1. I am an Assistant District Attorney at the New York County District Attorney's Office ("DANY"), and currently serve as the Bureau Chief of the Violent Criminal Enterprise Unit ("VCEU"), a position I have held since 2010.
2. In 2011, I oversaw an investigation and prosecution of a narcotics sales and illegal firearms possession conspiracy on West 137<sup>th</sup> Street, between Lenox and Seventh Avenues in New York County, known as the "137<sup>th</sup> Street Crew." Several DANY staff, including attorneys, investigative analysts, and others worked on this matter. The case involved multiple grand jury presentations.
3. As the lead attorney on this case I am familiar with the origins of the investigation, and the sources, including witnesses, that served as its evidentiary foundations. As such, I affirm that Raheem Powell was not a cooperating witness for DANY, nor did he testify in any proceedings related to the prosecution of the 137<sup>th</sup> Street Crew.

I declare under penalty of perjury that the foregoing is true and correct. Executed in New York, New York on April 19, 2017.

  
CHRISTOPHER RYAN